

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 5:18CR516
	:	
Plaintiff,	:	
	:	JUDGE GWIN
vs.	:	
	:	
DAVID LEE MITCHELL,	:	
	:	<b><u>MOTION TO CONTINUE</u></b>
Defendant.	:	<b><u>SENTENCING</u></b>

Defendant David Lee Mitchell, through counsel, requests his 3/13/19 sentencing hearing be continued to the same date as his Codefendant and sister, Laini A. Woods. The Codefendants' Plea Agreements have identical sentencing guideline calculations and will present similar objections and information regarding the calculations prepared by U.S. Probation. We therefore respectfully request a continuance to the new date of 6/13/19 in order to jointly resolve the outstanding objection. The additional time will also allow Mr. Mitchell to keep working.

Respectfully submitted,

/s/Justin J. Roberts  
Justin J. Roberts  
Ohio Bar: 0086168  
J. Roberts, LLC  
Fifth Third Building, Suite 1300  
600 Superior Avenue  
Cleveland, OH 44114  
(216) 417-2114  
E-mail: justin.roberts@jrobertslegal.com  
(Counsel for Defendant David Lee Mitchell)

**CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2019, a copy of the foregoing Motion to Continue Sentencing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/Justin J. Roberts  
JUSTIN J. ROBERTS (#0086168)  
J. Roberts, LLC